

BARCLAY DAMON ^{LLP}

Erin M. Tyreman
Partner

July 31, 2025

Via Electronic Filing

Hon. Miroslav Lovric
Magistrate Judge for the U.S. District Court
for the Northern District of New York

Re: Leor Kweller v. The County of Broome, et al.
Case No. 3:25-cv-00343 (AJB/ML)

Dear Judge Lovric:

We represent Defendants former District Attorney Michael Korchak and Chief Assistant District Attorney Mark Loughran in the above-referenced matter.

I submit this correspondence as a letter motion seeking permission to file excess pages in our Reply to Plaintiffs' Opposition to our Motion for Dismissal such that we request permission to file a Reply of twenty-five (25) pages in length.

The basis for this request is that Plaintiff has filed a Memorandum (Dkt. 47) which totals seventy-six (76) pages in opposition to our motion. In addition, the Memorandum in Opposition analyzes the claims as they relate to all "Defendants." In doing so, Plaintiffs have lumped Korchak and Loughran in collectively with ADAs Congdon and Cronin as "District Attorney Defendants" throughout his Opposition arguing that the "District Attorney Defendants" were involved in the investigation and therefore are not entitled to absolute immunity. To properly Reply and analyze the specific activities of Korchak and Loughran for purposes of the application of absolute immunity, as well as address the arguments regarding the twelve causes of action from the Complaint, we believe that twenty-five (25) pages will be required, but will endeavor to keep the reply brief as concise as possible.

We thank the Court for its time, attention, and courtesies in this matter.

Very truly yours,

/s/ Erin M. Tyreman
Erin M. Tyreman
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